

December 23, 2003

Mr. Biff Bradley
Nuclear Energy Institute
Suite 400
1776 I Street, NW
Washington, DC 20006-3708

SUBJECT: DECEMBER 16, 2003: SUMMARY OF MEETING WITH NEI, EPRI AND
INDUSTRY REPRESENTATIVES ON RISK MANAGEMENT TECHNICAL
SPECIFICATIONS GUIDELINES FOR INITIATIVE 4b

Dear Mr. Bradley:

The purpose of this letter is to transmit the summary of a meeting with the Industry representatives on Risk Management Technical Specifications Guidelines. The meeting was held at the U.S. Nuclear Regulatory Commission offices in Rockville, Maryland, on December 16, 2003.

Sincerely,

/RA/

T. R. Tjader, Senior Reactor Engineer
Technical Specifications Section
Reactor Operations Branch
Division of Inspection Program Management
Office of Nuclear Reactor Regulation

Enclosures:

1. Meeting Summary
2. Attendance List
3. Agenda
4. RMTS Guidelines Brief
5. RMTS RMG NRC Review Comment Resolution Responses Matrix
6. RMTS Guidelines

cc w/encl: See attached page

December 23, 2003

Mr. Biff Bradley
Nuclear Energy Institute
Suite 400
1776 I Street, NW
Washington, DC 20006-3708

SUBJECT: DECEMBER 16, 2003: SUMMARY OF MEETING WITH NEI, EPRI AND
INDUSTRY REPRESENTATIVES ON RISK MANAGEMENT TECHNICAL
SPECIFICATIONS GUIDELINES FOR INITIATIVE 4b

Dear Mr. Bradley:

The purpose of this letter is to transmit the summary of a meeting with the Industry
representatives on Risk Management Technical Specifications Guidelines. The meeting was
held at the U.S. Nuclear Regulatory Commission offices in Rockville, Maryland, on
December 16, 2003.

Sincerely,

/RA/

T. R. Tjader, Senior Reactor Engineer
Technical Specifications Section
Reactor Operations Branch
Division of Inspection Program Management
Office of Nuclear Reactor Regulation

Enclosures:

1. Meeting Summary
2. Attendance List
3. Agenda
4. RMTS Guidelines Brief
5. RMTS RMG NRC Review Comment Resolution Responses Matrix
6. RMTS Guidelines

cc w/encl: See attached page

DISTRIBUTION:

BBoger/CCarpenter (RidsNrrDipm)	FMReinhart (FMR)	CKDoutt (CKD)]	RKMathew (RKM)
WDBeckner (RidsNrrDipmlrob)	MLWohl (MLW1)	DFThatcher (DFT)	DHShum (DHS)
SCBlack (RidsNrrDssa)	NSaltos (NTS)	MACaruso (MAC)	ADAMS
TRQuay (RidsNrrDipmlehb)	WScott (WES)	MDrouin (MXD)	PUBLIC
MDTschiltz (RidsNrrSpsb)	GSShukla (GSS)	MCThadani (MCT)	TSS R/F
JNHannon (RidsNrrDssaSplb)	SPWall (SPW)	SCDinsmore (SCD)	TSS Staff
OGC (RidsOgcRp)	WDReckley (WDR)	SBSun (SBS)	
ACRS/ACNW (RidsAcrcAcnwMailCenter)	DGHarrison (DGH)	OPChopra (OPC)	

ADAMS ACCESSION NUMBERS: Package ML033650093, Memo ML033650110, Enclosure 4
ML040020046, Enclosure 5 ML040020047, Enclosure 6 ML040050217

OFFICE	TSS:IROB-A:DIPM	SC:TSS:IROB-A:DIPM		
NAME	TRTjader	THBoyce		
DATE	12/23/2003	12/23/2003		

OFFICIAL RECORD COPY

Mr. Biff Bradley

cc via e-mail:

Mr. Tony Pietrangelo
Nuclear Energy Institute

Mr. Biff Bradley
Nuclear Energy Institute

Mr. Mike Schoppman
Nuclear Energy Institute

Mr. Alan Hackerott, Chairman
Omaha Public Power District

Mr. Jim Kenny
Pennsylvania Power & Light Company

Mr. James Andrachek
Westinghouse Electric Company

Mr. Jack Stringfellow
Southern Nuclear Operating Company

Mr. Donald McCamy
Browns Ferry Nuclear Plant

Mr. Ray Schneider
Westinghouse Electric Company

Mr. Frank Rahn
EPRI

Mr. Wayne Harrison
STP

Mr. Drew Richards
STP

Mr. Wei He
PSEG

Mr. Rick Grantom
STP

Mr. Glenn Stewart
Exelon

Mr. Phil Tarpinian
Exelon

Mr. Lane Hay
SERCH/Bechtel

Mr. Rick Hill
General Electric Nuclear Energy

Mr. Michael S. Kitlan, Jr.
Duke Energy Corporation

Mr. Noel Clarkson
Duke Energy Corporation

Mr. Donald Hoffman
EXCEL Services Corporation

Mr. Ted Book
Framatech-ANP

Mr. R. J. Schomaker
Framatech-ANP

Mr. J. E. Rhoads
Energy Northwest

Ms. Deann Raleigh
Scientech

Mr. Ken Canavan
DS&S

Mr. Sam Chien
SCE

Mr. Gary Chung
SCE-SONGS

Mr. Courtney Smyth
PSEG Nuclear LLC

Mr. Jerry Andre
Westinghouse Electric Company

Mr. David Helher
Exelon

Mr. Eugene Kelly
Exelon

Mr. James Liming
ABSG

Mr. Stanley Levinson
Framatone ANP

SUMMARY OF THE DECEMBER 16, 2003 MEETING WITH NEI, EPRI AND INDUSTRY
REPRESENTATIVES ON RISK MANAGEMENT TECHNICAL SPECIFICATIONS GUIDELINES
FOR INITIATIVE 4b

The NRC staff met with Industry representatives on December 16, 2003, from 9:00 a.m. to 4:00 p.m. The meeting attendees are listed in Enclosure 2.

The agenda (Enclosure 3) consisted of discussions of: the Industry presentation (Enclosure 4) on Risk Management Technical Specifications (RMTS) Guidelines for RMTS Initiative 4b, Risk-Informed Completion Times; and, the Industry response (Enclosure 5) to the NRC Staff review comments to the prior version of the RMTS Guidelines. The current version of the RMTS Guidelines are provided in Enclosure 6. Following is a brief description of the discussions.

The information and level of detail contained in the RMTS Guidelines will determine whether Initiative 4b will be a candidate for the Consolidated Line Item Improvement Process (CLIIP), and to a greater degree, whether exportable guidance will be provided to the follow-on plants to the pilot plants. The RMTS Guidelines needs to provide exportable guidance that is applicable, reliable and repeatable in other follow-on plants. With this objective in mind, pilot plant acceptance criteria needs to be established for initiative 4b. The NRC staff will propose pilot plant and RMTS Guidance acceptance criteria for discussion at the next meeting on RMTS Initiative 4b. In addition, to ensure that the industry and NRC staff are proceeding in a legally acceptable manner with RMTS Initiative 4b, the NRC staff will discuss the possible processes to be utilized with the NRC Office of General Council. The RMTS Guidance document must contain discussions of the following:

- The RMTS Initiative 4b Configuration Risk Management (CRM) process must be an enhanced (a)(4) risk assessment and management process that is consistent with NUMARC 93-01, Revision 2 Section 11, which is endorsed by the NRC in RG 1.182. Note: Section 11 is the same in Revisions 2 and 3 to NUMARC 93-01.
- Reactor Oversight Performance Indicators, PRA annual evaluations, risk assessment evaluations, and instantaneous and aggregate risk limits must together act as an incentive to limit the time in the extended Risk-Informed Completion Times (CT). The process should result in an ALARA like process to maintain risk as low as reasonably achievable. An LCO exit strategy must be addressed.
- The 30 day CT backstop needs to be explained and justified in the RMTS Guidance. It should be utilized with applicable systems when catastrophic type failures are experienced, and not for routine and expected maintenance.
- Risk assessments for preplanned entries into an extended Risk-Informed CT (RICT) must be conducted prior to entry. The 24 hours provided to complete risk assessments for emergent conditions needs to be explained and justified. For emergent conditions the on-line risk assessment must be performed within 1 hour after entry into the RICT, or within the 1 hour an initial assessment must be made that confirms that 24 hours to complete the full configuration risk assessment is acceptable.

- 2 -

- The RMTS Guidance must explain that a plants ability to apply RMTS Initiative 4b must be commensurate with its PRA Quality. The plants PRA Quality must be consistent with DG-1122 (trial Reg Guide 1.200) guidance.
- The level of documentation required for an RMTS Initiative 4b risk assessment must be described.
- The RMTS Guidance must be consistent with the processes described in the STP and CE pilot plant proposals. Terminology needs to be consistent between the RMTS Guidance, the pilot proposals, and the (a)(4) program.
- The RMTS Guidance should provide direction on whether the process should apply to all LCOs.
- The RMTS Guidance should discuss how the blending of a qualitative assessment with the quantitative assessment should occur.

The industry intends to apply RMTS Initiative 4b to emergent plants conditions that will include complete loss of system function; Initiative 4b will subsume Initiative 6 on LCO 3.0.3 entry. The industry needs to address the nexus between Initiative 4b and Initiative 6.

It is expected that SERs will be written for the STP and CE (Fort Calhoun) pilot plant proposals, and for the subsequent generic changes (i.e., Topicals and TSTFs). It is also expected that either an SER will be written on the RMTS Guidance document, or that it will become a Reg Guide.

The following meetings are planned:

- | | |
|-------------------|---|
| January 21, 2004: | STP DG-1122 Pilot meeting |
| January 29, 2004: | Initiative 4b meeting covering RMTS Guidance changes needed to proceed with the pilots, RMTS Guidance and Pilot Plant acceptance criteria, and the CE pilot proposal (TSTF-424) |
| January 30, 2004: | Initiative 1, End States, CE TSTF-422 and BWR TSTF-423. |

The week of January 12, 2004: CRM Forum at the FPL Juno Beach FL facility

NRC/INDUSTRY MEETING OF THE
RISK-INFORMED TECHNICAL SPECIFICATION TASK FORCE ATTENDANCE LIST
NOVEMBER 13, 2003

<u>NAME</u>	<u>AFFILIATION</u>
BIFF BRADLEY	NUCLEAR ENERGY INSTITUTE
DON HOFFMAN	TSTF/EXCEL SERVICES
FRANK RAHN	EPRI
RICK GRANTOM	STP NOC
DREW RICHARDS	STP NOC
ALAN HACKEROTT	OPPD
JIM ANDRACHEK	WESTINGHOUSE/WOG
JACK STRINGFELLOW	SOUTHERN NUCLEAR OPERATING COMPANY
WEI HE	PSEG
RICK HILL	GE
RAY SCHNEIDER	WESTINGHOUSE PSA
JAMES LIMING	ABSG
DEANN RALEIGH	SCIENTECH
LANE HAY	SERCH/BECHTEL
TOM BOYCE	NRC/NRR/DIPM/IROB/TSS
BOB TJADER	NRC/NRR/DIPM/IROB/TSS
CARL SCHULTEN	NRC/NRR/DIPM/IROB/TSS
MARK REINHART	NRC/NRR/DSSA/SPSB
STU MAGRUDER	NRC/NRR/DSSA/SPSB
NICK SALTOS	NRC/NRR/DSSA/SPSB
MARK CARUSO	NRC/NRR/DSSA/SPSB
DONNIE HARRISON	NRC/NRR/DSSA/SPSB
STEPHEN DINSMORE	NRC/NRR/DSSA/SPSB
MILLARD WOHL	NRC/NRR/DSSA/SPSB
CLIFF DOUTT	NRC/NRR/DSSA/SPSB
SUMMER SUN	NRC/NRR/DSSA/SRXB
WAYNE SCOTT	NRC/NRR/DIPM/IEPB
GARETH PARRY	NRC/NRR/DSSA

AGENDA

TSS/NEI-EPRI RMTS GUIDELINES MEETING

DECEMBER 16, 2003

9:00 A.M. - 4:30 P.M.

0-4 B6

- Industry presentation of Initiative 4b, Risk-Informed Completion Times, RMTS Risk Management Guidelines
- Public Questions and Discussion
- Industry Response to NRC Staff of Acceptance Review Comments Presentation and Discussion
- Public Questions and Discussion
- Meeting Results and Follow-up Actions
- Closing Comments